

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:

**GATEWAY ENTERTAINMENT,
STUDIOS, LP,**

Bankruptcy No. 16-21628-CMB

Debtor.

Chapter 11

PLAN SUMMARY

Gateway Entertainment Studios LP, the Debtor in the above Chapter 11 Case, has proposed a Plan of Reorganization Dated October 28, 2016 ("the Plan") and sets forth a summary thereof as follows:

1. Secured Class 2 (31st Street Business Park, LLC) will be paid in full on the effective date of the plan.
2. Administrative Class 1 (Counsel for the Debtor, Counsel for the Creditors' Committee, Counsel for 31st Business Park, LLC and the U.S. Trustee) will be paid in full on the plan effective date subject to court approval.
3. The Debtor will pursue settlement with Unsecured Class 3 (Charles A. Knoll, Daryl Price, Waterwheel Studios, LLC and Waterwheel Productions). In the event that a settlement is not reached, the Debtor will object to this claim.
4. The Debtor will pursue settlement with Unsecured Class 4 (Em Ache Productions, LLC). In the event that a settlement is not reached, the Debtor will object to this claim.
5. Unsecured Class 5 (Retrotherm Insulators, Sommer Law Group, P.C., Jones Day, Duquesne Light Company and the Commonwealth of Pennsylvania) will be paid in full on the plan effective date.

6. The Debtor will object to the claims of Unsecured Class 6 (Fagnelli Plumbing, Inc., South Hills Builders, LLC, DQE Communications, LLC, Sante Berarducci, Inc., Burchick Construction Company, Inc., Dinsmore & Shohl, LLP and Hill, Barth & King, LLC). To the extent that any of these claims are allowed, the Debtor will pay them from funds escrowed following the sale of its real property.

7. Unsecured Class 7 (the Dale Carroll Rosenbloom, Jr. Irrevocable Trust and the Lucia Rodriguez 2003 Irrevocable Trust) will be given the option to accept payment of their claims in full in exchange for extinguishing their equity or receive no payment and retain their equity in the Debtor.

8. The funding for the plan will come through a sale of the Debtor's real property. The Debtor has an agreement with Midwood Investment and Development for a Private Sale of its Real Estate Assets (Excluding the RCAP Grants and Scheduled Insurance Claim) in the amount of \$14,000,000.00. The sale will be funded upon plan confirmation.

Respectfully Submitted,

Date: October 28, 2016

/s/ Robert O Lampl
ROBERT O LAMPL
PA I.D. #19809
JOHN P. LACHER
PA I.D. #62297
DAVID L. FUCHS
PA I.D. #205694
RYAN J. COONEY
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CERTIFICATE OF SERVICE

Robert O Lampl, John P. Lacher, David L. Fuchs and Ryan J. Cooney, hereby certify,
that on the 28th day of October, 2016, a true and correct copy of the foregoing **PLAN**
SUMMARY was served upon the following (*via electronic service*):

Norma Hildenbrand
Office of the U.S. Trustee
970 Liberty Center
1001 Liberty Avenue
Pittsburgh, PA 15222

Richard Tarantine
411 Seventh Avenue
Suite 1200
Pittsburgh, PA 15219

Kirk B. Burkley
Bernstein-Burkley, P.C.
2200 Gulf Tower
707 Grant Street
Pittsburgh, PA 15219

Date: October 28, 2016

/s/ Robert O Lampl
ROBERT O LAMPL
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JOHN P. LACHER
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